

**Franklin Road Groundwater Site
PRP RESPONSE SUMMARY**

Property of Interest	780 Brookside Drive, Spencer, Indiana 47460	
Entity Name	Boston Scientific	
Entity Current Name	Boston Scientific Corporation	
Date of Response	6/3/2019	
Respondent Name	Charmaine Mullins-Jaime	
Respondent Title	EHS Manager	
Respondent Address	Boston Scientific Corporation 780 Brookside Drive Spencer, Indiana 47460	
Respondent Phone	812-829-4877	
Respondent Email	EHSafetySPE@bsci.com	
Attorney/Representative Name and Contact Information	N/A	
Firm Name and Address	N/A	
Exemption/Defense Asserted (Which One?)	No	
Additional Parties Identified?	No	
Certified as True by Authorized Signature?	No	
104(e) Response Summary		
<p>On June 3, 2019, Boston Scientific Corporation (the Respondent) provided its responses to EPA's 104(e) Information Request letter. The Respondent identifies the following individuals as being instrumental in compiling its response:</p> <ul style="list-style-type: none"> • Charmaine Mullins-Jaime, EHS Manager, provided information on spill history investigation, coordinated the team, and gathered data; • Rita Lester, Senior OHS Specialist, provided information on spill history, chemicals and waste; • Shonna McCracken, EHS Specialist II, provided information on chemicals and waste; • Jessica McIntosh, EHS Technician, provided information on spill history, chemicals and waste; • Steve Naldi, Inventory Planning Manager II, provided information on spill history, chemical purchases and quantities; • Ashley Wells, Senior Global Sourcing Specialist, provided information on past hazardous waste handlers and a copy of the lease; • Jim Donnelly, Facilities Manager, provided information about the Property of Interest; • Robert Matson provided information on spills; • Joe Maley provided information on spills and hazardous waste room history; • Frank Woodruff provided information on a toluene spill; • Karen Vance provided information on property history; • Mary McClain provided information on how chemicals were handled in the past and some information on a toluene spill; and • Je Ellen White provided information on how chemicals were handled in the past and information on a toluene spill. <p>The Respondent submitted several collections of records, referred to as appendices, with its response. These documents include a wide range of information, such as waste manifests, safety data sheets (SDSs), lease information, interviews, maps and drawings, permits, hazardous waste reports, and spill reports. It cited the appendices throughout its response. In addition, it provides a description of certain</p>		

**Franklin Road Groundwater Site
PRP RESPONSE SUMMARY**

processes, such as the purchasing, receiving, processing, and storing of hazardous substances at the Property of Interest. For specific questions, the Respondent refers EPA to the "Vance family" or "Vance owner" response.

The Respondent identifies its staff and its waste management vendors who may have knowledge about the generation, transportation, treatment, disposal or handling of hazardous substances. In course of responding to other questions, the Respondent references EPA to the relevant appendix it enclosed with its response. Appendix 7-A, Ingredient Details, and Appendix 7-B, Product Hazard Details List, identifies the chemical composition, characteristics and physical state of each hazardous substance that it currently has on site or is currently active in its system. Scanned copies of archived SDSs can be found in Appendix 7-C.

The Respondent included purchasing, timeline, product quantity, and supplier information in Appendix 7-D, Chemical Purchases. These records date back to 1997. The purchasing record retention policy is only 10 years. Purchasing information on cleaning products used by IPC, the cleaning services vendor of the Respondent, are included in Appendix 7-E.

The Respondent included its hazardous waste manifests since 1995, excluding the period of 2004 to 2012, in Appendix 7-G. It explains it no longer have manifests from this period and its prior vendors did not have copies as well when the Respondent contacted them. The waste manifests show the increasingly frequent disposal of waste materials, primarily methyl ethyl ketone, and the infrequent disposal of trichlorotrifluoroethane. There is no mention of other notable chlorinated solvents on the manifest.

The Respondent stores chemicals not in use in chemical cabinets in the hazardous material storage room. Hazardous waste is placed in satellite waste containers, which is picked up every other day, and taken to the hazardous waste storage room. This room has always been used for chemical storage/waste since the Respondent began operating on site. The Respondent has a Small Quantity Generator Status number for hazardous waste and RCRA ID IND02672136.

The Respondent describes and attaches documentation regarding an incident wherein a contractor's dump truck rolled over and spilled diesel fuel from its fuel tank onto the pavement on October 26, 2017. An account of this spill is provided in Appendix 20-A. According to this account, the remediation that occurred over the next month included pressure washing the affected area with an environmentally safe detergent and vacuuming the runoff. The Respondent identifies two other smaller chemical spills that occurred at the Property of Interest; both spills were cleaned up and it properly disposed of the spill kit material. On July 19, 2013, 1 gallon of air compressor coolant spilled in the compressor room. On November 2, 2015, a hydraulic line broke and fluid was spilled. In addition, according to the recollection of an employee, one gallon of toluene was spilled on the production floor sometime between 1996 and 1999. The spill was cleaned up and did not escape into the environment.